

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
LINDRAN PROPERTIES, LLC (SHORELINE)	)	Case No. 20-02834
	)	
Debtor.	)	Hon. Jack B. Schmetterer
	)	
	)	

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**SECOND SUPPLEMENTAL DECLARATION OF SCOTT N. SCHREIBER PURSUANT  
TO BANKRUPTCY RULES 2014 AND 2016 IN SUPPORT OF THE APPLICATION TO  
AUTHORIZE THE RETENTION AND EMPLOYMENT OF CLARK HILL PLC  
AS BANKRUPTCY COUNSEL**

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I, Scott N. Schreiber, hereby declare:

1. I am an attorney duly licensed to practice before the United States District Court for the Northern District of Illinois and a member of the law firm of Clark Hill PLC, located at 130 E. Randolph Street, Suite 3900, Chicago, Illinois 60601.

2. I respectfully submit this Second Supplemental Declaration in connection with the application (the "Application") of the above-captioned debtor and debtor in possession (the "Debtor") to retain and employ Clark Hill PLC and the members, attorneys, and paralegals of Clark Hill PLC (collectively, "Clark Hill") as its bankruptcy counsel.

3. I have personal knowledge of the matters set forth herein. If called upon to testify, I could testify competently to the facts contained herein.

4. On March 17, 2020, the Court held a continued hearing on the Application and ordered Clark Hill and the U.S. Trustee to reach a resolution on all outstanding issues the U.S. Trustee raised in its objection to the Application. On March 18, 2020, Clark Hill and attorneys for the U.S. Trustee conferred telephonically to resolve the outstanding issues as follows:

- a. Clark Hill will not represent Better Housing Foundation, Inc., the sole member and manager of the Debtor, in any matter or capacity during the bankruptcy case;
- b. Clark Hill previously disclosed its connections with UMB Bank, N.A. (“UMB”), that UMB consented to Clark Hill’s continued representation of the Debtor when UMB substituted as successor trustee, and that Clark Hill instituted a conflicts wall, pursuant to Rule 1.7 of the Model Rules of Professional Responsibility, to ensure no attorneys representing the Debtor and no attorneys representing UMB communicate while the Debtor’s bankruptcy case is pending [Docket No. 51, at ¶ 7(j)]. Clark Hill also disclosed that no attorney representing the Debtor has ever represented UMB and no attorney representing UMB has ever represented the Debtor. *Id.*;
- c. Clark Hill previously disclosed that Wilmington Trust served as the indenture trustee until the Summer 2019, and that in early 2019, prior to UMB becoming the successor trustee, Clark Hill conducted its loan and lien analysis [Docket No. 82, at Exhibit A, ¶ 8]. Clark Hill’s loan and lien analysis was completed several months prior to UMB becoming successor trustee and confirmed the extent and priority of the indenture trustee’s liens. *Id.*;
- d. If any facts arise that may convert any of the connections or potential conflicts previously disclosed by Clark Hill, in the Application or any subsequent declarations, to an actual conflict, including, without limitation, any previously unknown claims of the Debtor against Paper Street Realty, LLC, Clark Hill shall immediately file a supplemental declaration that discloses such facts and all actions Clark Hill has taken to ensure compliance with the Model Rules of Professional Responsibility, Section 327(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2014, and to maintain “disinterested” status; and
- e. If any facts arise that may convert any potential conflicts of one or more of the Affiliated Entities previously disclosed by Clark Hill, in the Application or any subsequent declarations, to an actual conflict, Clark Hill shall immediately file a supplemental declaration that discloses such facts and all actions Clark Hill has taken to ensure compliance with the Model Rules of Professional Responsibility, Section 327(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2014, and to maintain “disinterested” status.

5. I will supplement this Declaration pursuant to the terms set forth above or if I become aware of any additional connections.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: March 20, 2020

/s/ Scott N. Schreiber <sup>1</sup>  
SCOTT N. SCHREIBER

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<sup>1</sup> A “wet signature” will be uploaded as soon as possible.